



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MB/AS
F. #2019R01465

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 12, 2020

By ECF and Overnight Mail

Alex Spiro, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Ave., 22nd Floor
New York, NY 10010

Re: United States v. Javier Aguilar
Criminal Docket No. 1:20-CR-00390 (ENV)

Dear Mr. Spiro:

Enclosed please find the government's fourth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's earlier productions. The government also again requests reciprocal discovery from the defendant.

Specifically, enclosed please find: the contents, other than potentially privileged material that was withheld by the producing party, of a fourth email account used by the defendant, BATES numbered JVA-EMAIL-0000516055 - JVA-EMAIL-0000519562. These emails were produced to the government by the defendant's employer, Vitol, Inc. Because the email account being produced is the defendant's work email account, in an abundance of caution, the government is producing a copy of the entire collection of data it received from Vitol, Inc.

Please also note that, in connection with the government's third production of discovery dated on October 21, 2020, the government's production included search warrant returns for a third email account used by the defendant, bearing BATES numbers JVA-EMAIL-0000514740 - JVA-EMAIL-0000516054. The government's October 21, 2020 letter erroneously stated that the government's filter attorney had in her possession potentially privileged records from that email account. In fact, the government produced the entirety of that email account to you.

Please do not hesitate to contact me if you would like to discuss this correction.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/ Mark E. Bini
Mark E. Bini
Andrey Spektor
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (ENV) (by ECF)
Ann Brickley & Adam Schwartz, U.S. Department of Justice
Derek Ettinger, Jonathan Robell & Clayton Solomon, U.S. Department of Justice

Discovery Index: United States v. Javier Aguilar No. 1:20-CR-00390

Discovery Letter 1 (Volume 1) - Thumb Drive 1		
Description	Beg Bates	End Bates
Javier Aguilar post-arrest statement (302)	DOJ-ADD-0000000001	DOJ-ADD-0000000006
Javier Aguilar recordings	DOJ-AV-0000000001	DOJ-AV-0000000033

Discovery Letter 2 (Volumes 2-4) - Thumb Drives 2-4		
Description	Beg Bates	End Bates
Grand Jury subpoena returns and WhatsApp chats	DOJ-JVA-0000000001	DOJ-JVA-0000036773
Google search warrant return for accounts: perezmarcos007@gmail.com and jaamex@gmail.com	JVA-EMAIL-0000000001	JVA-EMAIL-0000514739
Rule 902(11) certifications, 1A files and notes related to post-arrest statement FD-302	DOJ-ADD-0000000007	DOJ-ADD-0000000045

Discovery Letter 3 (Volumes 5-6) - Thumb Drive 5		
Description	Beg Bates	End Bates
Google SW return for account: sixtotomas007@gmail.com	JVA-EMAIL-0000514740	JVA-EMAIL-0000516054
Panama & Curacao MLAT Returns	DOJ-JVA-0000036774	DOJ-JVA-0000047162

Discovery Letter 4 (Volume 7) - Disc 1		
Description	Beg Bates	End Bates
Aguilar custodial records for email account: jva@vitol.com	JVA-EMAIL-0000516055	JVA-EMAIL-0000519562